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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NIKKI GIAVASIS , Individually, And)	Case No. 2:16-cv-02284-R-AFM
On Behalf Of All Others Similarly)	
Situated,)	JOINT STIPULATION OF
	DISMISSAL OF ACTION WITH
Plaintiff,)	PREJUDICE AS TO THE NAMED
v.)	PLAINTIFF AND WITHOUT
	PREJUDICE AS TO THE
DENT-A-MED INC., dba HC)	PUTATIVE CLASS
PROCESSING CENTER; DOES 1-10)	
inclusive,)	
Defendant.)	
_____)	

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

1 The notice and approval requirements of Federal Rule of Civil Procedure
2 23(e) are inapplicable to the parties' settlement and dismissal of this putative
3 class action because this action has not been certified as a class.¹

4 The Parties agree that this Court can proceed to dismiss this Action entirely
5 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
6 Class alleged in the complaint.

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8 Respectfully submitted this 3rd day of January, 2017

9 By: s/Todd M. Friedman, Esq.
10 TODD M. FRIEDMAN
11 Attorney for Plaintiffs

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13 By: s/Esteban Morales Fabila, Esq.
14 ESTEBAL FABILA
15 Attorneys for Defendant

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¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 Filed electronically on this 3rd day of January, 2017, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

4
5 Honorable Manuel L. Real
6 United States District Court
7 Central District of California

8 Esteban Morales Fabila
9 Mintz Levin Cohn Ferris Glovsky and Popeo PC

10 Joshua M Briones
11 Mintz Levin Cohn Ferris Glovsky and Popeo PC

12 E Crystal Lopez
13 Mintz Levin Cohn Ferris Glovsky and Popeo PC

14
15 This 3rd day of January, 2017

16 s/Todd M. Friedman, Esq.
17 TODD M. FRIEDMAN